

EXHIBIT "A"

B12015642014

No. 3029 P. 2

Oct. 16. 2017 6:45PM

Paul Femia, Esq., L.L.C.
 100 Jefferson Avenue
 3rd fl., Suite 303
 Elizabeth, New Jersey 07201
 (908) 352-6901
 Attorney for Plaintiff
 Attorney ID No.: 021181986

JORGE L. CABRERA-VELASQUEZ

Plaintiff,

vs.

GREGORY S. HALSTEAD, WERNER
 ENTERPRISES, INC., JOHN DOE
 1-10 (a fictitious name
 representing unknown
 individuals) and ABC
 CORPORATIONS 1-10 (fictitious
 names representing unknown
 corporations)

Defendants,

: SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION: UNION COUNTY

: DOCKET NO.: UNN-L-3530-17

Halstead, Gregory

2015555871

10-9-15

SUMMONS

LM

Attn MP

THE STATE OF NEW JERSEY, to the following Defendant:

WERNER ENTERPRISES, INC.

YOU ARE HEREBY SUMMONED in a Civil Action in the Superior Court of New Jersey, instituted by the above named Plaintiff(s), and required to serve upon the attorney(s) for the Plaintiff(s), whose name and office address appears above, an answer to the annexed complaint within 35 days after the service of the summons and complaint upon you, exclusive of the day of service. If you fail to answer, judgment by default may be rendered against you for the relief demanded in the complaint. You shall promptly file your answer and proof of service thereof in duplicate* with the Clerk of the Superior Court, Union County Courthouse, located at 2 Broad Street, New Jersey 07207 in accordance with the rules of civil practice and procedure.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: October 16, 2017

MICHELLE M. SMITH/s/

Clerk of the Superior Court

Name of defendant to be served:
 Address for Service:

Werner Enterprises, Inc.
 14507 Frontier Road
 Omaha, NE 68138

OCT 17 2017 SLW

Personal service
 was accepted at
 the front desk by
 W Taylor

10-17-2017

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PAUL FEMIA, ESQ., LLC.
 100 JEFFERSON AVENUE
 3rd FL., SUITE 303
 ELIZABETH, NJ 07201
 (908) 352-6901
 Attorney for Plaintiff
 Attorney ID No.: 021181986

JORGE L. CABRERA-VELASQUEZ	: SUPERIOR COURT OF NEW JERSEY
	: LAW DIVISION: UNION COUNTY
	:
Plaintiff,	:
	:
vs.	: DOCKET NO.: UNN-L-
	:
GREGORY S. HALSTEAD, WERNER	:
ENTERPRISES, INC., JOHN DOE	:
1-10 (a fictitious name	:
representing unknown	:
individuals) and ABC	:
CORPORATIONS 1-10 (fictitious	: COMPLAINT AND
names representing unknown	: JURY DEMAND
corporations)	:
	:
Defendants,	:

Plaintiff, JORGE L. CABRERA-VELASQUEZ, residing at 544
 Livingston Street, 1st fl., in the City of Elizabeth, County of
 Union and State of New Jersey, by way of complaint against the
 defendant says:

FIRST COUNT

1. On or about October 9, 2015 plaintiff, was a driver,
 who was traveling at or near the intersection of Magnolia Avenue
 and Division Street in the City of Elizabeth, County of Union and
 State of New Jersey.

2. At the aforesaid time and place, defendant, GREGORY S.
 HALSTEAD was the operator of a vehicle owned by defendant WERNER
 ENTERPRISES, INC. which was traveling at or near the intersection

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of Magnolia Avenue and Division Street in the City of Elizabeth, County of Union and State of New Jersey.

3. At the aforesaid time and place, Defendants GREGORY S. HALSTEAD and WERNER ENTERPRISES, INC. operated and or otherwise allowed his/her/their motor vehicle to be operated in a careless, wreckless and negligent manner so as to cause same to collide with each other resulting in severe and permanent injuries to the plaintiff.

4. As a direct and proximate result of the aforesaid negligence, carelessness and recklessness of the Defendants GREGORY S. HALSTEAD and WERNER ENTERPRISES, INC., the plaintiff JORGE L. CABRERA-VELASQUEZ was violently tossed about the vehicle in which he was traveling, and was caused to suffer severe and permanent injuries to multiple parts of his body, did suffer and will in the future continue to suffer great pain and anguish; was caused to seek and will in the future be caused to seek medical and hospital treatment; was caused to expend or incur and will in the future be caused to expend or incur monies in an effort to treat his injuries; was caused to lose time from and will in the future be caused to lose time from his usual and customary activities, pursuits and occupation; was caused to suffer permanent injuries and was otherwise caused to suffer injuries and damages.

5. The injuries sustained by Plaintiff JORGE L. CABRERA-VELASQUEZ are not otherwise barred by the Automobile Insurance Cost Reduction Act (AICRA).

WHEREFORE, the plaintiff, JORGE L. CABRERA-VELASQUEZ, hereby

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demands judgment against the Defendants, GREGORY S. HALSTEAD and WERNER ENTERPRISES, INC., for damages, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff JORGE L. CABRERA-VELASQUEZ repeats each and every allegation of the First Count of this Complaint as if set forth herein at length.

2. JOHN DOE 1-10 (a fictitious name representing unknown individuals) and ABC CORPORATIONS 1-10 (fictitious names representing unknown corporations) are names used for the purpose of this lawsuit to represent parties, drivers, operators and automobile owners, whose names or identities are not yet known and who may have either directly or indirectly contributed to the injuries sustained by the Plaintiff.

3. At all times relevant hereto, the defendants, JOHN DOE 1-10 (a fictitious name representing unknown individuals) and ABC CORPORATIONS 1-10 (fictitious names representing unknown corporations) operated and/or otherwise allowed their respective motor vehicles to be operated in a negligent and reckless manner so as to cause the plaintiff JORGE L. CABRERA-VELASQUEZ to be violently tossed about the vehicle in which he was traveling. Due to the negligence and recklessness of the said defendants, the Plaintiff was caused to suffer severe and permanent injuries to multiple parts of his body, did suffer and will in the future continue to suffer great pain and anguish; was caused to seek and

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will in the future be caused to seek medical and hospital treatment; was caused to expend or incur and will in the future be caused to expend or incur monies in an effort to treat his injuries; was caused to lose time from and will in the future be caused to lose time from his usual and customary activities, pursuits and occupation; was caused to suffer permanent injuries and was otherwise caused to suffer injuries and damages.

WHEREFORE, the Plaintiff JORGE L. CABRERA-VELASQUEZ demands judgment against the defendants, JOHN DOE 1-10 (a fictitious name representing unknown individuals) and ABC CORPORATIONS 1-10 (fictitious names representing unknown corporations) jointly, severally or in the alternative, for money damages together with interest and cost of suit on this count.

PAUL FEMIA, ESQ.

By: Paul Femia, Esq.

Dated: October 8, 2017

Oct. 16. 2017 6:46PM

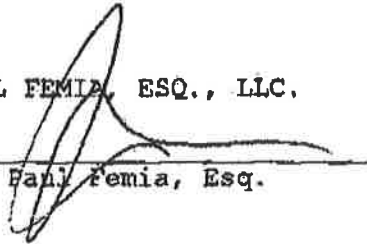
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JURY DEMAND

1. Plaintiff hereby demands a trial by Jury as to all issues herein.

PAUL FEMIA, ESQ., LLC.

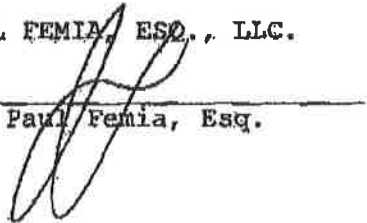
By:  Paul Femia, Esq.

Dated: October 8, 2017

DESIGNATION OF TRIAL COUNSEL

Paul Femia, Esq. is hereby designated as Trial Attorney in the within matter.

PAUL FEMIA, ESQ., LLC.

By:  Paul Femia, Esq.

Dated: October 8, 2017

DEMAND FOR ANSWERS TO INTERROGATORIES

In accordance with Rule 4:17-1 it is hereby demanded that defendant GREGORY S. HALSTEAD and WERNER ENTERPRISES, INC. provide Answers to Form C and C(1) Interrogatories within the timelines provided by Court Rules.

PAUL FEMIA, ESQ., LLC.

By:  Paul Femia, Esq.

Dated: October 8, 2017

Oct. 16. 2017 6:46PM

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CERTIFICATION

1. I am an Attorney at Law of the State of New Jersey, a partner with the law firm of **PAUL FEMIA, ESQ. L.L.C.**, attorneys for plaintiff(s) in the within action.

2. Pursuant to Rule 4:5-1, the matter in controversy is not the subject of any action pending in any other Court or of a pending arbitration proceeding.

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

PAUL FEMIA, ESQ., LLC.

By: Paul Femia, Esq.

Dated: October 9, 2017

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Civil Case Information Statement

Case Details: UNION Civil Part Docket# L-003530-17

Case Caption: CABRERA-VELASQUEZ JORGE VS
HALSTEAD GREGORY

Case Initiation Date: 10/04/2017

Attorney Name: PAUL FEMIA

Firm Name: PAUL FEMIA, ESQ. LLC

Address: 100 JEFFERSON AVENUE 3RD FLOOR SUITE
303

ELIZABETH NJ 072010000

Phone:

Name of Party: PLAINTIFF : Cabrera-Velasquez, Jorge, L

Name of Defendant's Primary Insurance Company
(if known): Werner Enterprises

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL
THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

**I certify that confidential personal identifiers have been redacted from documents now submitted to the
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)**

10/04/2017

Dated

/s/ PAUL FEMIA
Signed